



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
 75 Hawthorne Street  
 San Francisco, CA 94105

September 11, 2007

VIA FEDERAL EXPRESS

James Caudill, President  
 Price Pfister, Inc.  
 19701 Da Vinci  
 Foothill Ranch, CA 92610

Re: Information Request Letter for the San Fernando Valley/North Hollywood  
 Superfund Site, North Hollywood, California

Dear Mr. Caudill:

The United States Environmental Protection Agency ("EPA") is spending public funds to investigate and respond to actual or threatened releases of hazardous substances, pollutants, and contaminants at the San Fernando Valley Area 1 site, North Hollywood Operable Unit ("NHO" or "the Site"), located in Los Angeles County, California. This letter seeks your cooperation in providing information and documents relating to contamination underlying all or portions of the cities of Burbank, Los Angeles, North Hollywood, Sun Valley, and Pacoima, California. This request is for information that you may have pertaining to Price Pfister, Inc.'s (the "Company") facility currently or formerly located at 13500 Paxton Street, Pacoima, California (the "Facility"). The Company was a settling defendant or the corporate successor to a settling defendant under the Second Partial Consent Decree in United States of America v. Allied Signal, Inc., et.al., Civil No. 93-6490-MRP, which was filed with the U.S. Central District Court on May 12, 1997, and entered into on May 14, 1997.

EPA believes that the Company may have information that will assist the California Regional Water Quality Control Board ("RWQCB") and EPA in their investigation of the Site, especially with regard to trichloroethylene ("TCE"), tetrachloroethylene ("PCE"), and chromium. EPA requests that the Company answer the questions contained in Enclosure B. Definitions and instructions on how to respond to the questions are provided in Enclosure A.

Under Section 104(e) of CERCLA, 42 U.S.C. §9604(e), EPA has broad information-gathering authority which allows EPA to require persons to furnish information or documents relating to:

- (A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility.

(B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.

(C) Information relating to the ability of a person to pay for or perform a cleanup.

Please note that the Company's compliance with this information request is mandatory. Failure to respond fully and truthfully may result in an enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5). This statutory provision authorizes EPA to seek the imposition of penalties of up to \$32,500 per day of noncompliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001. The information the Company provides may be used by EPA in administrative, civil, or criminal proceedings.

Some of the information EPA is requesting may be considered by the Company to be confidential. Please be aware that the Company may not withhold information upon that basis. If the Company wishes EPA to treat the information confidentially, it must advise EPA of that fact by following the procedures outlined in Enclosure A, including the requirement for supporting its claim for confidentiality.

This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See also, 5 C.F.R. §§1320.3(c), 1320.4, and 1320.6(a).

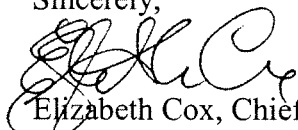
We encourage the Company to give this matter its immediate attention and request that it provide a complete and truthful response to this information request within thirty (30) calendar days of its receipt of this letter. EPA is committed to moving forward with its investigation, and extensions of time for responses will only be granted upon a showing of good cause. If the Company anticipates that it will need an extension, please request one as soon as possible. Requests for extensions made at or near the due date will not be viewed favorably by EPA. The Company's response to this letter should be made in writing and signed by you or a duly authorized representative of the Company. If some or all of the requested information has previously been provided to EPA, the Company may incorporate that information by referencing the date of the earlier response and the information contained therein that is responsive to the current information request.

The Company's response should include the appropriate name, address, and telephone number of the person to whom EPA should direct future correspondence in regard to this information request. The Company's response to the information request should be directed to:

Kim Muratore, Case Developer (SFD-7-5)  
U.S. EPA, Region 9  
75 Hawthorne St.  
San Francisco, CA 94105

If the Company has any questions regarding this letter, please contact Ms. Muratore at (415) 972-3121 or [muratore.kim@epa.gov](mailto:muratore.kim@epa.gov). Questions regarding the Site's cleanup status should be directed to the Remedial Project Manager, Rachel Loftin, at (415) 972-3253 or [loftin.rachel@epa.gov](mailto:loftin.rachel@epa.gov). Questions regarding legal matters can be directed to Michael Massey at (415) 972-3034 or [massey.michael@epa.gov](mailto:massey.michael@epa.gov). Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Cox", written over the printed name.

Elizabeth Cox, Chief  
Case Development Cost Recovery Section  
Superfund Division

Enclosures (2)

## ENCLOSURE A: INSTRUCTIONS AND DEFINITIONS

### Instructions:

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this information request. For each question contained in this letter, if information responsive to this information request is not in the Company's possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Number Each Answer. When answering the questions in Enclosure B, please precede each answer with the corresponding number of the question and subpart to which it responds.
3. Number Each Document. For each document produced in response to this information request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.
4. Provide the Best Information Available. Provide responses to the best of the Company's ability, even if the information sought was never put down in writing or if the written documents are no longer available. The Company should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available will be considered non-compliance with this information request.
5. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that the Company relied on in producing its answer.
6. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this information request become known or available to the Company after it responds to this information request, EPA hereby requests pursuant to CERCLA Section 104(e) that the Company supplement its response to EPA.
7. Scope of Request. The scope of this request includes all information and documents independently developed or obtained by research on the part of the Company, its attorneys and consultants or any of their agents, consultants, or employees.
8. Confidential Information. The information requested herein must be provided even though the Company may contend that it includes confidential information or trade secrets. The Company may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b). If the Company makes a claim of confidentiality for any of the information it submits to EPA, it must prove that claim. For each document or response the Company claims as confidential, it must separately address the following points:
  - (a) Clearly identify the portions of the information alleged to be entitled to confidential treatment;

- (b) Identify the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
  - (c) Identify measures taken by the Company to guard against the undesired disclosure of the information to others;
  - (d) Explain the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
  - (e) Provide pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
  - (f) State whether the Company asserts that disclosure of the information would likely result in substantial harmful effects to the Company's competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.
  - (g) To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. The Company should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit the Company's response so that all nonconfidential information, including any redacted versions of documents, are in one envelope and all materials for which the Company desires confidential treatment are in another envelope.
  - (h) All confidentiality claims are subject to EPA verification. It is important that the Company satisfactorily show that it has taken reasonable measures to protect the confidentiality of the information and that it intends to continue to do so, and that the information is not and has not been obtainable by legitimate means without the Company's consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to the Company.
9. Disclosure to EPA's Authorized Representatives. Information that the Company submits in response to this information request may be disclosed by EPA to authorized representatives of the United States pursuant to 40 C.F.R. §2.310(h) even if the Company asserts that all or part of it is confidential business information. The authorized representatives of EPA to which EPA may disclose information contained in the Company's response are as follows:

Arctic Slope Regional Corp.  
EPA Contract Number 68-R9-0101

Department of Toxic Substances Control/California  
Environmental Protection Agency

Science Applications International Corporation  
EPA Contract Number GS-10F-0076J

Any subsequent additions or changes in EPA contractors who may have access to the Company's response to this information request will be published in the Federal Register.

This information may be made available to these authorized representatives of EPA for any of the following reasons: to assist with document handling, inventory, and indexing; or to assist with document review and analysis for verification of completeness; or to provide expert technical review of the contents of the response. Pursuant to 40 C.F.R. §2.310(h), the Company may submit comments on EPA's potential disclosure of any confidential information to its authorized representatives within the thirty (30) calendar day period in which the response is due.

10. Objections to Questions. If the Company has objections to some or all of the questions contained in the information request, it is still required to respond to each of the questions.

Definitions Applicable to Enclosure B, Information Request:

1. Any reference to Price Pfister, Inc. or the "Company" should be interpreted to include, but not be limited to, all officers, managers, employees, contractors, assigns, agents, trustees, predecessors, successors, subsidiaries, operating divisions, affiliates, and branches.
2. The term "person" shall include any individual, firm, unincorporated association, partnership, corporation, trust, joint venture, or other entity.
3. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge.
4. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA.
5. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
6. The term "release" has the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.

7. The term “pollutant or contaminant” shall have the same definition as that contained in Section 101(33) of CERCLA and include any mixtures of such pollutants and contaminants with any other substance including petroleum products.
8. The term “materials” shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site including, but not limited to, all hazardous substances, pollutants or contaminants.
9. The term “documents” includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.
10. The term “Facility” should be interpreted to include the entire property defined or any discrete portion thereof. If the Company’s answer refers only to a discrete portion of the Facility, it should specify which portion is being referred to.

## ENCLOSURE B: INFORMATION REQUEST

EPA records indicate that Price Pfister, Inc. previously settled with the EPA and the State of California for costs associated with the Interim Remedial Action for the San Fernando Valley's North Hollywood Operable Unit, as evidenced by its signature on the Second Partial Consent Decree, United States of America v. Allied-Signal, Inc., et al., Civil No. 93-6490-MRP, filed with the United States District Court for the Central District of California on May 12, 1997 (the "Consent Decree"). Despite a diligent search of historical records, EPA has been unable to locate any information previously supplied by Price Pfister, Inc. or its predecessors regarding its ownership of and/or operations at the Facility property.

1. State the full legal name, address, telephone number, position(s) held by, and tenure of the individual(s) answering any of the questions below on behalf of Price Pfister, Inc. (the "Company").
2. Please provide one or more contact names and current contact information (address and phone number) for individuals within the Company who are familiar with the Consent Decree and the basis for the Company's involvement as a signatory to the Consent Decree.
3. The Consent Decree defines Price Pfister, Inc. as a "Settling Defendant," describing it as a party who was not sued by the governments but who was related to one or more of the other defendants or to the property where such other defendants operated. (Section II.O). Please explain the circumstances under which the Company was originally brought into the litigation and/or negotiations surrounding the Consent Decree, including the identity of the party who brought the Company into the litigation, a description of the relationship between the Company and such party or property, and a summary of the reasoning or claims alleged by such party as a basis for the Company's involvement.
4. Identify the individuals who are or were responsible for environmental matters at the Company's facility located at 13500 Paxton Street, Pacoima, California (the "Facility"). Henceforth, the term "Facility" shall be interpreted to include both the real property at 13500 Paxton Street and any improvement thereto. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates each individual held such position.
5. Explain the Company's present operational status (e.g., active, suspended, defunct, merged, or dissolved).
6. Provide the date the Company was incorporated, formed or organized. Identify the State in which the Company was incorporated, formed or organized.
7. Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates and identify all former business structures under which it existed or operated at the Facility.



8. For each business structure under which the Company has existed or operated at the Facility, provide the corresponding dates that it existed or operated under that business structure, the name(s) it used, and the Facility addresses at which it operated or was otherwise located.
9. Provide a copy of the articles of incorporation, partnership agreement, articles of organization, or any other documentation (together with any amendments) demonstrating the particular business structure under which the Company has existed or operated since its inception.
10. If the Company is or was operating under a fictitious business name at the Facility, identify the fictitious name and the owner(s) of the fictitious name, and provide a copy of the Fictitious Business Name Statement filed with the county in which the Company is or was doing business.
11. Provide the dates the Company, under any of its current or former business structures, owned the Facility. Identify all parcel numbers and street addresses associated with the Facility and provide a copy of the title documentation evidencing the Company's ownership of the Facility.
12. For any period of time in which the Company, under any of its current or former business structures, owned the Facility, provide the name, address, and phone number of any tenant or lessee. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to any other operators at the Facility.
13. Provide the dates that the Company, under any of its current or former business structures, operated at the Facility. Identify all parcels of real property involved in the Company's operations at the Facility, including all street addresses associated therewith.
14. For any period of time in which the Company, under any of its current or former business structures, operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to the real property owner during the Company's occupancy of the Facility.
15. Identify any individual or entity that owned or operated the Facility prior or subsequent to the Company. For each prior or subsequent owner or operator, further identify:
  - a. The dates of ownership/operation;
  - b. The nature of prior or subsequent operations at the Facility;
  - c. All evidence showing that the prior or subsequent owner or operator controlled access to the property; and
  - d. All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at the Facility during the period of prior or subsequent ownership or operation.

16. Provide a complete list of employees who had knowledge of the use of hazardous substances and disposal of wastes at the Facility during any or all of the period of time that the Company operated at or was otherwise associated with the Facility. For each employee listed, provide the following information:
  - a. The employee's full name;
  - b. The employee's current or last known address and telephone number, including the last known date on which you believe each address and telephone number was current;
  - c. The dates that the employee worked at the Facility;
  - d. The position(s) the employee held under any of the Company's business structures; and
  - e. The employee's job title(s) and the corresponding dates during which the Company believes that the employee would have had knowledge of the use and disposal of wastes.
17. Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and the product(s) manufactured or services performed by the Company at the Facility. Describe any significant change in Facility size, the number of employees, or the products manufactured over time.
18. If any substance containing chromium as a component ("chromium-related substances") was utilized in any of the Company's operations at the Facility, provide a complete description of those operations. Indicate the approximate volume of chromium or chromium-related substances used per month at the Facility, the dates chromium or chromium-related substances were used, and the storage and disposal practices in effect during the Company's operations at the Facility for materials containing chromium. Include documentation evidencing the Company's use of chromium or chromium-related substances.
19. Provide a scaled map of the Facility which includes the locations of significant buildings and features. Indicate the locations of any maintenance shops, machine shops, degreasers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:
  - a. Surface structures (e.g., buildings, tanks, containment and/or storage areas, etc.);
  - b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.);
  - c. Groundwater and dry wells, including drilling logs, date(s) of construction or completion, details of construction, uses of the well(s), date(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s);
  - d. Past and present stormwater drainage system and sanitary sewer system, including septic tank(s) and subsurface disposal field(s);
  - e. Any and all additions, demolitions or changes of any kind to physical structures on, under or about the Facility or to the property itself (e.g., excavation work), and state the date(s) on which such changes occurred; and

- f. The location of all waste storage or waste accumulation areas as well as waste disposal areas, including but not limited to dumps, leach fields, and burn pits.
- 20. Provide copies of hazardous material business plans and chemical inventory forms (originals and updates) submitted to city, county, and state agencies regarding operations at the Facility.
  - 21. Provide a list of all chemicals and hazardous substances used at the Facility, identifying the chemical composition and quantities used. Provide copies of Material Safety Data Sheets for all hazardous substances used.
  - 22. Identify and provide the information below for all volatile organic compounds (most notably PCE; TCE; 1,1-DCE; MTBE; ,14-DCA, cis-1,2-DCE; and carbon tetrachloride); Title 22 metals including total and hexavalent chromium; 1,4-dioxane; N-nitrosodimethylamine (NDMA); perchlorate; dioxins and furans, which are or were used at, or transported to, the Facility:
    - a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance and the Material Safety Data Sheet for each product;
    - b. The location(s) where each chemical or hazardous substance is or was used, stored, and disposed of;
    - c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
    - d. The quantity purchased (in gallons), the time period during which it was used, and the identity of all persons who used it; and
    - e. The supplier(s), and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks, or any other documents pertaining to the supply of chemicals or hazardous substances.
  - 23. Provide copies of all environmental data or technical or analytical information regarding soil, water, and air conditions at or adjacent to the Facility, including, but not limited to, environmental data or technical or analytical information related to soil contamination, soil sampling, soil gas sampling, geology, water (ground and surface), hydrogeology, groundwater sampling, and air quality.
  - 24. Identify, and provide the following information for, all groundwater wells that are located at the Facility:
    - a. A map with the specific locations of the Facility groundwater wells;
    - b. Date the Facility groundwater wells were last sampled;
    - c. List of all constituents which were analyzed during groundwater sampling events; and
    - d. All groundwater sampling results, reports of findings, and analytical data.
  - 25. Provide copies of any applications for permits or permits received under any local, state, or federal environmental laws and regulations, including any waste discharge permits, such as national pollutant discharge elimination system permits.

26. If the Company discharged any of its waste stream to the sewer at the Facility, provide copies of all permits and all analyses performed on discharged water, and identify all locations where waste streams were discharged.
27. For each waste stream generated at the Facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.
28. Please provide a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the Facility prior to transport to a disposal site.
29. Please describe the method used by the Company to remove waste streams from sumps at the Facility.
30. Please identify all wastes that were stored at the Facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.
31. Please identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. In addition, identify and provide supporting documentation of:
  - a. The date each release occurred;
  - b. The cause of each release;
  - c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
  - d. Where each release occurred and what areas were impacted by the release; and
  - e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.
32. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

VIA FEDERAL EXPRESS

James Caudill, President  
Price Pfister, Inc.  
19701 Da Vinci  
Lake Forest, CA 92610

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Superfund Site, North Hollywood, California

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MAIL CODE	SFD-7-5	ORC-3	SFD-7.4	SFD 75			
SURNAME	MURATORE	Massey	Loggins	Cox			
DATE	8/30/07	8/30/07	9.5.07	9/7/07			

U.S. EPA CONCURRENCES

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Module H, 4th Floor  
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Memphis, TN 38194-4643  
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September 18,2007

Dear Customer:

The following is the proof of delivery you requested with the tracking number **924619068908**.

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**Delivery Information:**

<b>Status:</b>	Delivered	<b>Delivery location:</b>	FOOTHILL RANCH, CA
<b>Signed for by:</b>	N.MOSES	<b>Delivery date:</b>	Sep 12, 2007 09:36
<b>Service type:</b>	Standard Envelope		



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**Shipping Information:**

<b>Tracking number:</b>	924619068908	<b>Ship date:</b>	Sep 11, 2007
		<b>Weight:</b>	0.5 lbs.

**Recipient:**  
FOOTHILL RANCH, CA US

**Shipper:**  
OAKLAND, CA US

**Reference** 06-5026-01-9506-009

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